

**PRIVACY NOTICE
FOR CLIENTS' REPRESENTATIVES AND BENEFICIAL OWNERS**

(GDPR Aligned)

CONTENTS

Clause	Page
1. Introduction.....	1
2. Source of your personal data	1
3. When does this privacy statement apply?	1
4. Who is responsible for your personal data?	1
5. For which purposes do we process your personal data?	1
6. Who has access to your personal data?	3
7. How are your personal data secured?.....	3
8. What are your rights?	3

1. INTRODUCTION

This is Trust Pay's Privacy Notice under Art. 14 of the GDPR for Client's representatives and beneficial owners. If you are a Client's representative or a beneficial owner, this Privacy Notice provides you with information on the processing of personal data by Trust Pay (**Trust Pay** or **we**).

2. SOURCE OF YOUR PERSONAL DATA

We received your personal data from the person acting on behalf your company, our contractual party (**Client**).

3. WHEN DOES THIS PRIVACY STATEMENT APPLY?

This Privacy Notice is applicable to Trust Pay's processing of all personal data of its Clients' beneficial owners, representatives and persons authorised by these representatives. When a Client enters into a contractual agreement with Trust Pay, it is required, as part of concluding the contract, to provide us with some personal data of its representatives and, in some cases, of its ultimate beneficial owners.

4. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Trust Pay is the controller of the processing of all personal data that fall within the scope of this Privacy Notice. This Privacy Notice indicates what personal data are processed by Trust Pay and for what purpose, and to which persons or entities the data will or may be provided.

Trust Pay resides at:

Za kasárňou 315/1
Bratislava 831 03
Slovak Republic

5. FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

The personal information that we process can be divided into two categories:

(a) To comply with legally required assessments under the Slovak Anti-money laundering law

(i) What does this purpose entail?

In some cases, Trust Pay processes Clients' representatives and beneficial owners' personal data to comply with laws and regulations on anti-money laundering.

To comply with the relevant laws and regulations, we may need to disclose your personal data to government institutions, supervisory authorities, banks and our providers.

(ii) On what legal grounds do we process personal data for this purpose?

The basis for processing your personal data is Trust Pay's legal obligation entailed in the Slovak Act No. 297/2008 Coll. on the Prevention of Legalization of Proceeds of Criminal Activity and Terrorist Financing and on Amendments and Supplements to Certain Acts as amended by Acts Nos. 445/2008 and 186/2009.

(iii) Which personal data do we process for this purpose?

For this purpose, if you are a Client's representative, we collect:

- basic identification information such as name, surname, title, address of residence, date of birth, personal No., and contact information like phone No., email address, identity document (ID) and utility bills;
- Identity verification video.
- Number of Client's bank accounts at your disposal and related information (i.e. information regarding the persons entitled to deal with the account);
- Business licences, their extent and validity (if applicable); and
- Previous political/public functions in case you, as a Client's representative, still hold that function or were released from the function within the past year.

If you are a Client's ultimate beneficial owner, we also collect information regarding your identity and address (if applicable).

(iv) **For what period do we retain your personal data for this purpose?**

For this purpose, your personal data will be retained for the period required by the anti-money laundering law. After the purpose for retention under this section is served, your personal data will be deleted from our systems.

(b) For the conclusion and execution of agreements with Clients

(i) **What does this purpose entail?**

When a Client enters into a contractual relationship with us, we process your personal data for administrative purposes such as sending invoices and making payments and contacting you concerning specific Trust Pay service. Trust Pay will process your personal data to further execute our agreement, including for the delivery of customer services.

(ii) **On what legal ground do we process personal data for this purpose?**

The basis for processing your personal data is the performance of the contract with the Client you represent.

(iii) **Which personal data do we process for this purpose?**

For this purpose, we process your contact details, i.e. address and email address and personal details, i.e. your name and date of birth.

(iv) **For what period do we retain your personal data for this purpose?**

For this purpose, your personal data will be retained for the duration of the contractual relationship. After this term, your personal data will be deleted from our systems. When the specific personal data are collected and processed for both purposes a) and b), these personal data are retained according to the purpose a).

6. WHO HAS ACCESS TO YOUR PERSONAL DATA?

6.1 Access to your personal data within Trust Pay

Trust Pay's employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform Trust Pay's legal obligations.

6.2 Access to your personal data by third parties

Your personal data will not be supplied to third parties, except where required by law. The following third parties have access to your personal data under Trust Pay's legal obligations:

- Banks and other financial institutions involved in transactions connected with providing payment services
- State institutions
- Card associations, in case of TrustCard services are provided
- Providers of sanctions lists, identity verification and review of compliance with Anti-money laundering laws

7. HOW ARE YOUR PERSONAL DATA SECURED?

Trust Pay shall maintain appropriate technical and organizational measures for protection of the security (including protection against unauthorized or unlawful processing and against accidental or unlawful destruction, loss or alteration or damage, unauthorized disclosure of, or access to, personal data), confidentiality and integrity of Client's data. Trust Pay regularly monitors compliance with these measures.

8. WHAT ARE YOUR RIGHTS?

Subject to some limitations, you can request access to or the correction, restriction, portability or removal of the data that Trust Pay processes about you at any time by sending a request to our address Trust Pay, a.s., Za kasárňou 1, 831 03 Bratislava, Slovakia.

Should you have any questions regarding the processing of your personal data, please contact us by written request to our address: Trust Pay, a.s., Za kasárňou 1, 831 03 Bratislava, Slovakia.

If you feel that we are breaching the applicable privacy rules you have the right to lodge a complaint with the Office for Personal Data Protection of the Slovak Republic or other competent authority.